



## Kitsap County Department of Public Works

614 Division Street (MS-26), Port Orchard, WA 98366-4699

R. W. Casteel, P.E., Director

September 13, 2005

Department of Ecology  
Water Quality Program  
SEP 15 2005

Bill Moore  
WA Department of Ecology  
Water Quality Program  
PO Box 47600  
Olympia, WA 98504-7600

**Re: Preliminary Draft of NPDES Phase II Permit Appendix 6**

Dear Mr. Moore:

Following are Kitsap County's comments on the August 23, 2005 Preliminary Draft of NPDES Phase II Permit Appendix 6, Annual Report Form.

Format of Report: We recommend listing the required reporting parameters by year of the permit as done in the Eastern Washington Permit Annual Report. We recommend duplicating the format used in the Eastern Washington permit annual report. This uniformity would make it easier for the public and Ecology to review for compliance.

Actions completed prior to the permit: This report format does not account for actions taken prior to the permit. The questions should be written to account for prior acts such as creation of the stormwater management plan prior to the permit, watershed illicit discharge screening done prior to the permit, and training conducted prior to the permit.

Part 1 Instructions. The report form format does not appear to include questions that address some of the federal requirements listed under 40CFR122.35(g)(3).

Table 1: The number of individuals responsible for implementing a particular portion of the stormwater management program is irrelevant. The number of persons does not reflect the total effort (individuals does not equal full time equivalent employees). Total effort does not necessarily equate to results. Efficiency is not accounted for in this metric. Recommend reporting on results not efforts. Recommend removing all tracking of costs and efforts and only tracking results.

Section 1E. Training: This section is too vague. Recommend stating an expected level of training and reporting on the percentage of effected employees that have attained that level of training. Examples are the Regional Road Maintenance ESA training available through the University of Washington or Erosion Control Certification that is equivalent to the Western Washington Stormwater Manual BMP C160.

Section 2: The question regarding Costs of Development and Implementation is redundant. This question is answered by filling out table 2. Recommend removing this question.

Page 23 S9 Reporting Requirements: This entire section is redundant. Reporting on the annual report within the annual report is not necessary. Recommend deleting this entire section of the report.

Our staff contact for these comments is David Tucker, Senior Program Manager Surface and Stormwater Management Program. He can be reached at (360) 337-7292.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy W. Casteel". The signature is fluid and cursive, with a large "X" or "Z" shape at the end.

Randy W. Casteel, P.E.  
Director of Public Works

cc: David Tucker, P.E., Program Manager SSWM  
Commissioner Jan Angel  
Commissioner Chris Endresen  
Commissioner Patty Lent  
Cris Gears, County Administrator